UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

ROCK CREEK NETWORKS, LLC, Plaintiff v. **D-LINK CORPORATION,** Defendant	**Case No. 6:21-cv-68** **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Rock Creek Networks, LLC ("Plaintiff" or "RCN") files this Complaint against Defendant D-Link Corporation ("D-Link" or "Defendant") for infringement of RCN's patent: U.S. Patent No. 6,671,750 (PX-750 attached).

THE PARTIES

1. Plaintiff and patent owner RCN is a Texas limited liability company with its headquarters and principal place of business in Waco, Texas.

2. On information and belief, Defendant D-Link is a corporation organized under the laws of Taiwan, with a place of business at D-Link Corporation No. 289, Xinhu 3rd Road, Neihu District, Taipei 11494, Taiwan.

JURISDICTION AND VENUE

3. This is a patent suit brought under the United States Patent Act, namely 35 U.S.C. §§ 271, 281, and 284-285, among other laws. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b). Defendant markets, sells, and delivers accused products in this District, directs and instructs customers and end users how to use the accused products in this District, and has committed acts of infringement in this District.

NOTICE OF RCN'S PATENT

5. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,671,750 (the "'750 Patent"), entitled LAN INTERFACE, which issued on December 30, 2003. A copy of the '750 Patent is attached hereto as Exhibit PX-750.

6. RCN possesses all rights of recovery under the Asserted Patents.

7. Defendant has been on notice of the '750 Patent at least as early as the date it received service of this complaint.

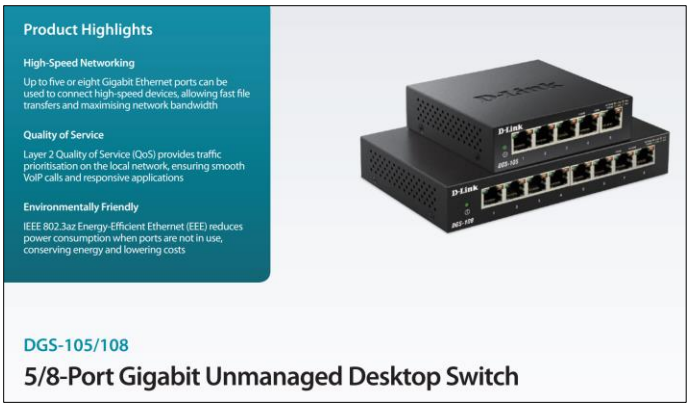
D-LINK'S PRODUCTS

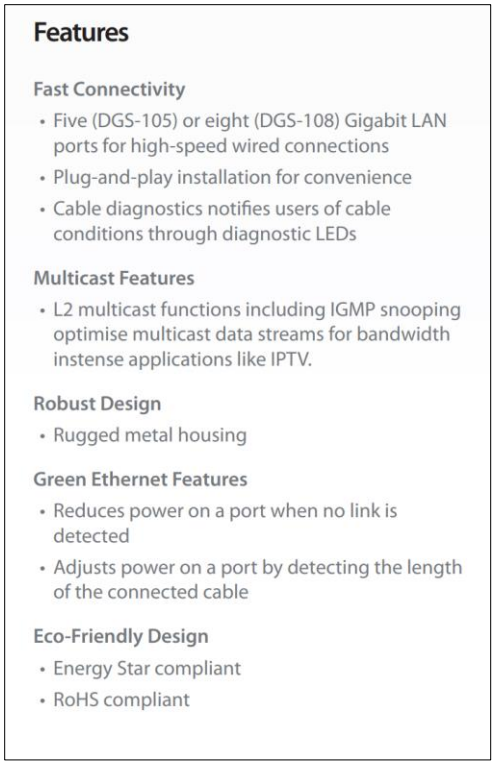
8. On information and belief, D-Link makes, imports, sells, offers to sell, distributes, licenses, markets and/or uses the network switches such as Gigabit Unmatched Desktop Switches ("the Accused Products").

9. According to D-Link, the 5/8 Port Gigabit Unmanaged Desktop Switch

includes "[l]ink status detection [that] automatically powers down ports when there is no link detected, saving power when the connected device has been shut down or disconnected." https://eu.dlink.com/uk/en/-/media/business_products/dgs/dgs-105/datasheet/dgs_105_108_c6_datasheet_en_eu.pdf.

10. According to D-Link, the 5/8 Port Gigabit Unmanaged Desktop Switch "include traffic management features, such as IEEE 802.1p Quality of Service (QoS) and IEEE 802.3x Flow Control." *Id.*





The DGS-105/108 5/8-Port Gigabit Unmanaged Desktop Switch are ideally suited for Small Office Home Office (SOHO), Small Medium Business (SMB), and Small Medium Enterprise (SME) environments. With a durable design, silent operation, and plug-and-play functionality, the DGS-105/108 switches can be easily set up and be placed in almost any location where network connectivity is required. Support for IEEE 802.3az Energy-Efficient Ethernet (EEE), Layer 2 Quality of Service (QoS), and Gigabit Ethernet connection speeds provide advanced features in a compact package.

Robust Design

The DGS-105/108 are designed with durability and performance in mind. Their sturdy metal housing ensures the product can withstand extreme temperatures and can be placed in typical industrial environments such as factories, construction and mining. They help to dissipate heat and reduce stress on internal components.

Integrated Networking

The DGS-105/108 switches use auto-sensing 10/100/1000 Mbps ports, allowing a small workgroup to flexibly connect Ethernet, Fast Ethernet, and Gigabit devices to create an integrated network. These ports detect the network speed and auto-negotiate between 10BASE-T and 100BASE-TX at full and half-duplex, and 1000BASE-TX at full duplex, allowing you to get the maximum speed possible for each device connected to your network.

Simplified Installation

All of the ports on the DGS-105/108 switches support automatic MDI/MDIX crossover, eliminating the need for crossover cables or uplink ports. Each port can be plugged in directly to a server, hub, router, or switch using regular straight-through twisted-pair Ethernet cables. In addition, the DGS-105/108 switches feature multiple front-facing, easy-to-access Ethernet ports with two colour LED indicators per port to easily distinguish link status.

Traffic Management

The DGS-105/108 switches include traffic management features, such as IEEE 802.1p Quality of Service (QoS) and IEEE 802.3x Flow Control. The 802.1p QoS feature allows traffic to be classified in 8 priority levels, allowing different types of traffic to be prioritised, depending on their importance. Flow Control signals to clients when the switch's input buffer is full, helping to minimise dropped packets and providing a more reliable connection for all of your connected devices.

Technical Specifications		
General		
Model Number	• DGS-105	• DGS-108
Device Interfaces	• 5 10/100/1000BASE-T ports	• 8 10/100/1000BASE-T ports
Standards	• IEEE 802.3 10BASE-T • IEEE 802.3u 100BASE-TX • IEEE 802.3ab 1000BASE-T • IEEE 802.3x Flow Control • IEEE 802.1p QoS • IEEE 802.3az Energy-Efficient Ethernet (EEE)	
Media Interface Exchange	• Auto MDI/MDIX adjustment for all ports	

Performance		
Transmission Method	• Store-and-forward	
Data Transfer Rates	• Ethernet: • 10 Mbps (half-duplex) • 20 Mbps (full-duplex) • Fast Ethernet: • 100 Mbps (half-duplex) • 200 Mbps (full-duplex) • Gigabit Ethernet: • 2000 Mbps (full-duplex)	
Packet Filtering/Forwarding Rates	• Ethernet: 14,880 pps per port • Fast Ethernet: 148,800 pps per port • Gigabit Ethernet: 1,488,000 pps per port	
MAC Address Table	• 2K entries	• 4K entries
MAC Address Learning	• Automatic update	
RAM Buffer	• 128 KB	• 192 KB

Physical		
Dimensions	• 100 x 98 x 28 mm (3.93 x 3.86 x 1.10 inches)	• 162 x 102 x 28 mm (3.54 x 2.83 x 1.06 inches)
Weight	• 267 grams (0.59 lbs)	• 415 grams (0.92 lbs)
Power	• 5 V/1 A	
Power Consumption	• Powered on (standby): • DC input: 0.3 W • AC input: 0.3 W • Maximum: • DC input: 1.85 W • AC input: 3.10 W	• Powered on (standby): • DC input: 0.4 W • AC input: 0.4 W • Maximum: • DC input: 3.05 W • AC input: 4.62 W
Temperature	• Operating: 0 to 45 °C (32 to 104 °F) • Storage: -10 to 70 °C (14 to 158 °F)	
Humidity	• Operating: 0% to 95% non-condensing • Storage: 0% to 95% non-condensing	
MTBF	• 604,194 hours	• 621,163 hours
Heat Dissipation	• Maximum: 6.31 BTU/h	• Maximum: 10.40 BTU/h

Certifications		
Safety	• cUL • CB • LVD	• CCC • BSMI
EMI/EMC	• FCC Class B • CE Class B • ICES-003 Class B	• RCM • CCC • BSMI
Software Features		
L2 Features	• IGMP Snooping	

https://eu.dlink.com/uk/en/-/media/business_products/dgs/dgs-

105/datasheet/dgs_105_108_c6_datasheet_en_eu.pdf.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,671,750

11. Plaintiff realleges and incorporates by reference the allegations in the preceding paragraphs as if fully set forth herein.

12. The '750 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Plaintiff is the owner by assignment of the '750 Patent.

14. The Accused Products are designed to connect to provide interactive services using applications.

15. Upon information and belief, Defendant has infringed and continue to infringe one or more claims, including Claim 1, of the '750 Patent by making, using, importing, selling, and/or, offering for sale the Accused Products in the United States without authority.

16. Defendant has infringed and continues to infringe the '750 Patent either directly or through the acts of inducement in violation of 35 U.S.C. § 271.

17. Defendant encourages others, including their customers, to use the Accused Products in the United States without authority.

18. Claim 6 of the '750 Patent recites:

> 6. A LAN interface comprising:
>
> a LAN controller for processing a signal transmitted from a terminal

connected to an I/O bus and then transmitting a processed signal to said counter device, and for processing a signal transmitted from said counter device and then transmitting a processed signal to said connection device;

a separator connected between said LAN controller and said I/O bus, for electrically disconnecting said LAN controller from said I/O bus; and

a link pulse detector for operating on a predetermined voltage supplied via said I/O bus and detecting a link pulse from said counter device connected to said connection port;

wherein said link pulse detector, when detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to an operation state thereof and, when not detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to a non-operation state.

19. As exemplified in the information referenced in the above paragraphs and the use of one or more of the Accused Products, the Accused Products include a LAN interface that has LAN controller for processing a signal transmitted from a terminal connected to an I/O bus and then transmitting a processed signal to said

counter device, and for processing a signal transmitted from said counter device and then transmitting a processed signal to said connection device.

20. The Accused Product has a LAN interface that has a separator connected between said LAN controller and said I/O bus, for electrically disconnecting said LAN controller from said I/O bus.

21. The LAN interface includes a link pulse detector for operating on a predetermined voltage supplied via said I/O bus and detecting a link pulse from said counter device connected to said connection port.

22. In operation, the link pulse detector, when detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to an operation state thereof and, when not detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to a non-operation state.

23. Defendant's infringing activities are and have been without authority or license under the '750 Patent.

24. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's infringing acts, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court, pursuant to 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendant:

1. declaring that the Defendant has infringed the ’750 Patent;
2. awarding Plaintiff its damages suffered as a result of Defendant’s infringement of the ’750 Patent;
3. awarding Plaintiff its costs, attorneys’ fees, expenses, and prejudgment and post-judgment interest; and
4. granting Plaintiff such further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury of all issues so triable pursuant to Fed. R. Civ. P. 38.

Dated: January 22, 2021

Respectfully Submitted,

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